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12 *Attorneys for Defendants*  
 13 Timothy Calumpong, Betty S. Omandac,  
 14 Ella Cordovez, and Gabriela Najera,

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 SANDRA HERRERA,

18 Plaintiff,

19 v.

20 FLORENCE MCLURE WOMEN'S  
 21 CORRECTIONAL CENTER FACILITY,  
 22 DEPARTMENT OF CORRECTION, a  
 23 Political Subdivision of The State of Nevada,  
 24 *et.al.*,

25 Defendants.

26 Case No: 2:23-cv-01397-JAD-BNW

27 **STIPULATION AND ORDER TO  
 28 EXTEND DEFENDANTS' REPLY IN  
 SUPPORT OF THEIR MOTION FOR  
 SUMMARY JUDGMENT  
 [ECF NO. 28]**

29 **(FIRST REQUEST)**

30 ECF No. 39

31 Defendants, Timothy Calumpong, Betty S. Omandac, Ella Cordovez, and Gabriela  
 32 Najera, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Mayra  
 33 Garay, Deputy Attorney General, of the State of Nevada, Office of the Attorney General  
 34 and Plaintiff by and through attorney of record, James D. Urrutia, Esq. of LNU LAW FIRM,  
 35 hereby submit their stipulation and agreement to extend the deadline for Defendants' to  
 36 file their Reply in Support of their Motion for Summary Judgment [ECF 28] and  
 37 respectfully request that the Court **extend the response deadline for a period of 20**  
 38 **days, making Defendants' new deadline June 11, 2025.** The parties' request is supported  
 39 in good cause.

40 Defense counsel is diligently working and conducting thorough research to respond  
 41 to Plaintiff's opposition to Defendants' Motion for Summary Judgment. However, due to

1 the passing of a close family member of Defense Counsel and the recent departure of  
2 Defense Counsel's paralegal, the parties have agreed to extend the response deadline to  
3 June 11, 2025.

4  
5 Dated this 22nd day of May, 2025.

6 **LJU LAW FIRM**

7  
8 /s/James D. Urrutia  
9 JAMES D. URRUTIA, ESQ.  
Nevada Bar No. 12885  
10 7575 Vegas Drive, Suite 100  
Las Vegas, Nevada 89128  
11 *Counsel for Plaintiff*

Dated this 22nd day of May, 2025.

6 **OFFICE OF THE ATTORNEY  
GENERAL**

7  
8 /s/ Mayra Garay  
9 MAYRA GARAY, ESQ.  
(Bar No. 15550)  
Deputy Attorney General  
10 1 State of Nevada Way, Suite 100  
Las Vegas, NV 89119  
11 *Counsel for Defendants*

12  
13 **IT IS SO ORDERED.**

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U.S. District Judge Jennifer A. Dorsey  
19 May 23, 2025